

Exhibit 2

Park, Chanwoo

From: Boisvert, Ashley K. <aboisvert@goldbergsegalla.com>
Sent: Tuesday, May 5, 2020 5:28 PM
To: Park, Chanwoo; Coghlan, John P.; O'Connor, Shannon T.; Dashnaw, Carolyn A.
Cc: Rachel Kleinman; Cara McClellan; kjohnson@naacpldf.org; Levitt, Jamie A.; Hill, Joshua, Jr.; Gayer, Amanda L.
Subject: RE: I.S. v. BCSD (N.D.N.Y.) - Schedule

- External Email -

Good afternoon:

We are available for a mediation on July 14, 15, 16, and 17. If there remains travel restrictions and/or physical distancing requirements by the mediation date, we are amenable to participating in a remote/virtual mediation with the expectation that Plaintiffs will also participate.

Thank you,
Ashley

Ashley K. Boisvert, Esq.

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From: Park, Chanwoo <CPark@mofo.com>
Sent: Monday, May 4, 2020 10:18 AM
To: Coghlan, John P. <jcoghlan@goldbergsegalla.com>; O'Connor, Shannon T. <soconnor@goldbergsegalla.com>; Boisvert, Ashley K. <aboisvert@goldbergsegalla.com>; Dashnaw, Carolyn A. <cdashnaw@goldbergsegalla.com>
Cc: Rachel Kleinman <rkleinman@naacpldf.org>; Cara McClellan <cmccllellan@naacpldf.org>; kjohnson@naacpldf.org; Levitt, Jamie A. <JLevitt@mofo.com>; Hill, Joshua, Jr. <JHill@mofo.com>; Gayer, Amanda L. <AGayer@mofo.com>
Subject: RE: I.S. v. BCSD (N.D.N.Y.) - Schedule

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Counsel,

We are following up on mediation scheduling and our April 14, 2020 discovery letter.

First, we are following up on our April 15, 2020 proposal to schedule an initial mediation before the Court-ordered August 24, 2020 deadline. (Dkt. 83). We understand from Defendants' April 17 status report that Defendants currently have a no pay position, but think the parties should nonetheless schedule an initial mediation before the August deadline and reach out to the mediator for her availability. Can you let us know whether there are dates in the weeks of July 6-10 and July 13-17 when you are available or provide some alternative dates before the August 24 deadline?

Second, we are following up on our April 14, 2020 letter asking Defendants' counsel to confirm whether you "will complete a search of the individual Defendants' phones for responsive text messages, chats, SMS messages, and MMS messages, and any other responsive ESI stored on the individual Defendants' phones, as well as a search of Defendants' emails (both personal and professional) within thirty days to determine whether there are communications relevant to the claims and defenses in the case." As noted in our April 14 letter, you indicated during the parties' March 26, 2020 telephonic meet and confer that Counsel for the Defendants had not completed a search for responsive ESI such as emails and text messages of the Defendants, but instead relied on your clients' representations to you that they have identified relevant information. Please confirm by this Wednesday, May 6, 2020, whether you intend to conduct the requested search and produce responsive ESI contained therein. If you are refusing to conduct the requested search and production, Plaintiffs will raise this issue with the Court.

Regards,
Chanwoo

CHANWOO PARK

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From: Park, Chanwoo

Sent: Wednesday, April 15, 2020 12:21 PM

To: 'Coghlan, John P.' <jcoghlan@goldbergsegalla.com>; O'Connor, Shannon T. <soconnor@goldbergsegalla.com>; Boisvert, Ashley K. <aboisvert@goldbergsegalla.com>; Dashnaw, Carolyn A. <cdashnaw@goldbergsegalla.com>

Cc: Rachel Kleinman <rkleinman@naacpldf.org>; Cara McClellan <cmcclellan@naacpldf.org>; kjohnson@naacpldf.org; Levitt, Jamie A. <JLevitt@mofo.com>; Hill, Joshua, Jr. <JHill@mofo.com>; Gayer, Amanda L. <AGayer@mofo.com>

Subject: I.S. v. BCSD (N.D.N.Y.) - Schedule

Counsel,

We write regarding two scheduling topics.

First, in light of the ongoing COVID-19 crisis and its current impact on travel, meetings, and other deposition logistics, we propose doing depositions in the case, for all parties, after the school year ends and assuming that travel and social distancing restrictions have eased by then. We understand that the Binghamton school year ends at the end of June. We think this timing will accommodate witnesses' increased availability during the summer months as well as the August 31, 2020 discovery deadline. It should also give witnesses and counsel enough advance notice to block off the appropriate

amount of time. Please let us know if Defendants are amenable to this schedule. We can then work on getting dates from our respective clients.

Second, during the parties' March 26, 2020 meet and confer, we discussed tentatively scheduling a first mediation in July 2020 and reaching out to the mediator for her availability. We are happy to reach out to her and wanted to first confirm whether certain dates work for you. Are there dates in the weeks of July 6-10 and July 13-17 that work? Please let us know and we can reach out to Ms. DiPoala Haber, copying you.

Regards,
Chanwoo

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